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November 21, 2017

VIA WEBSITE SUBMISSION ONLY

Environmental Protection Agency

Re: ***Susan LaLima v. American International Industries, et al.***
Supreme Court of the State of New York, Ulster County
Index No.: 17-2232

Dear Sir/Madam:

Please consider the following a formal request pursuant to the New York Freedom of Information Law, Article 6 of the Public Officers Law, I hereby request a copy of any and all documents, records, correspondence, contracts, reports, logs, test results, permits, citations/violations, hazardous waste disposal manifests, or any other records in any form (written or digital) pertaining to:

Shop-Rite
801 Miron Lane
Kingston, NY 12401

Metropolitan Life Insurance Company
115 Green Street #1
Kingston, NY 12401

Rustic Ridge View Farm
15 Old Queens Highway
Kerhonkson, NY 12446

New York State Thruway
NY Route 28 – Kingston-Rhinecliff Bridge

New York State Thruway
Woodstock – NY Route 32

Mr. Broadway Café a/k/a Mr. Broadway's Pizza
680 Broadway
Kingston, NY 12401

Pepe's Cucina
1776 Route 9W
Lake Katrina, NY 12449

Lowe's
901 Frank Sottile Boulevard
Kingston, NY 12401

Mammoth Card Shop
1200 Ulster Avenue
Kingston, NY 12401

Albany Public Market
Kingston, NY

Gem Cadillac-Oldsmobile Inc.
Chester-By-Pass
Kingston, NY 12401

Gem Cadillac-Oldsmobile Inc.
12 Hilltop Drive
Kingston, NY 12401

Fitzgerald Enterprises of New York, Inc.
35 Livingston Street
Kingston, NY 12401

Ground Round, Inc.
1300 Ulster Avenue
Kingston, NY 12401

Burns Lefever Agency, Inc.
261 Fair Street
Kingston, NY 12401

With respect to the location above, please accept this letter as a request for copies of the following documents specifically during the timeframe of **1960 to present**.

- Any and all records regarding asbestos;
- Any and all records regarding inspections for asbestos;
- Any and all records regarding installation or removal of asbestos;
- Any and all records pertaining to use of asbestos-containing products and asbestos-containing equipment;
- Any and all records regarding policies, procedures, inspection reports, asbestos management plans, and asbestos abatement actions performed pursuant to any other applicable governing authorities, including but not limited to, OSHA;
- Any and all records relating to air testing, or other dust-release testing performed and any and all asbestos analysis data sheets;
- Any and all records relating to asbestos remediation, including those that identify asbestos removal contractors and any contracts or reports for the removal of asbestos; and
- Any and all specification sheets for insulating materials, including but not limited to pipe insulation.

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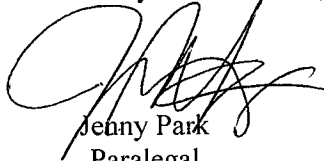
In order to help you to determine my status to assess fees, please note that we are seeking the above information for use in a pending lawsuit. I am willing to pay fees for this request up to a maximum of \$100.00. If you estimate that the fees will exceed this limit, please contact me first.

If you deny any part of this request, please cite each specific reason you believe justifies your refusal to release the information and notify me of the applicable appeal procedures available under the law.

If you have any questions regarding the processing of this request, please do not hesitate to contact the undersigned. Thank you for your consideration of my request.

Regards,

Gordon Rees Scully Mansukhani, LLP



Jenny Park
Paralegal